

RECEIVED

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

APR - 3 2006

CLERK  
U.S. DISTRICT COURT  
MIDDLE DIST. OF ALA.

DAVID PAHER and PHILENA PAHER,

Plaintiffs,

vs.

UICI, et al.,

Defendants.

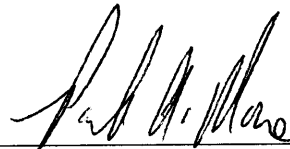
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

CIVIL ACTION NO.: 2:06 cv 297-DRB

**CONSENT AND JOINDER IN NOTICE OF REMOVAL**

COMES NOW, defendant National Association for the Self-Employed, Inc., by and through its undersigned counsel, and files its consent and joinder in the removal of this action from the Circuit Court of Covington County, Alabama.<sup>1</sup>

Dated this 31<sup>st</sup> day of March, 2006.



JAMES W. LAMPKIN II (LAMPJ7474)  
PAMELA A. MOORE (MOORP5421)  
Attorneys for Defendant  
National Association for the Self-Employed, Inc.

OF COUNSEL:

ALFORD, CLAUSEN & McDONALD, LLC  
One St. Louis Centre, Suite 5000  
Mobile, Alabama 36602  
(251) 432-1600  
(251) 432-1700 (fax)

<sup>1</sup> National Association for the Self-Employed, Inc. does not waive and specifically preserves any and all applicable defenses pursuant to Federal Rule of Civil Procedure 12, any administrative remedies available under the Insurance Certificate at issue, and any right to demand arbitration pursuant to any applicable agreement to arbitrate.

EXHIBIT

2

**RECEIVED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

APR - 3 2006

CLERK  
U.S. DISTRICT COURT  
MIDDLE DIST. OF ALA.

DAVID PAHER and  
PHILENA PAHER

Plaintiffs,

v.

CIVIL ACTION NO.: 2:06cv297-DRB

UICI;  
MEGA LIFE & HEALTH INSURANCE  
COMPANY;  
NATIONAL ASSOCIATION FOR THE  
SELF EMPLOYED;  
STEPHANIE TRANCHINA;  
and FICTITIOUS DEFENDANTS  
“A,” “B,” and “C,” whether singular or  
plural, are those other persons,  
corporations, firms, or other entities  
whose wrongful conduct caused or  
contributed to the cause of the injuries  
and damage to the plaintiff, all of  
whose true and correct names are  
unknown to the at this time,  
but which will be substituted by  
amendment when ascertained,

Defendants.

**DEFENDANT UICI'S CONSENT TO REMOVAL**

Undersigned counsel, on behalf of Defendant UICI, hereby consents to the removal of this case to the United States District Court for the Middle District of Alabama, Northern Division,<sup>1</sup> pursuant to 28 U.S.C. §§ 1441 and 1446.

<sup>1</sup> UICI specifically preserves and does not waive any and all applicable defenses pursuant to Federal Rule of Civil Procedure 12, any administrative remedies available under the Certificate, and any right to demand arbitration pursuant to any applicable agreement to arbitrate.



HENRY A. CALLAWAY, III (CALLH4748)  
E. LUCKETT ROBINSON, II (ROBIE6110)  
RODNEY R. CATE (CATER8568)  
Hand Arendall, L.L.C.  
Post Office Box 123  
Mobile, AL 36601  
Telephone: (251) 432-5511  
Facsimile: (251) 694-6375

Attorneys for Defendant The MEGA Life and  
Health Insurance Company

### CERTIFICATE OF SERVICE

I hereby certify that I have on this day, March 31, 2006, served a copy of the foregoing pleading on all counsel of record by placing a copy of same in the United States Mail, properly addressed and first class postage prepaid, as follows:

Thomas O. Sinclair  
CAMPBELL, WALLER & POER, LLC  
2100-A SouthBridge Parkway, Suite 450  
Birmingham, Alabama 35209  
Phone: (205) 803-0051  
Fax: (205) 803-0053

Allen G. Woodard  
WOODARD, PATEL & SLEDGE  
1213 East Three Notch Street  
Andalusia, Alabama 36420  
Phone: (334) 222-9115  
Fax: (334) 222-9448

James W. Lampkin, III  
Pamela A. Moore  
ALFORD, CLAUSEN, & McDONALD, LLC  
One St. Louis Centre, Suite 5000  
Mobile, Alabama 36602  
Phone: (251) 432-1600  
Fax: (251) 432-1700

